UNITED STATES DISTRICT COURT U.S. DISTRICT COURT EASTERN DISTRICT OF WISCONSINE ASTERN DISTRICT-WI

UNITED STATES OF AMERICA,

2024 MAY 14 P 4: 24

CLERK OF COURT

Plaintiff,

Case No. 24-CR-

[21 U.S.C. §§ 641(a)(1) 841(b)(1)(C), & 846; 18 U.S.C. §§ 922(a)(1)(A), 922(g)(1), 922(o), 924(a)(1)(D), 924(a)(2), 924(a)(8), 924(c), & (2)(a)]

JOHN D. TAYLOR and ALLISON A. MUNDT,

v.

Green Bay Division

Defendants.

INDICTMENT

COUNT ONE (Dealing firearms without a license)

THE GRAND JURY CHARGES THAT:

1. Beginning on or about March 9, 2024, and continuing until on or about April 17, 2024, in the State and Eastern District of Wisconsin and elsewhere,

JOHN D. TAYLOR and **ALLISON A. MUNDT**

knowingly and willfully engaged in the business of dealing in firearms at wholesale and retail, without a license issued under Title 18, United States Code, Chapter 44.

2. The firearms involved in the offense included the following:

*	Make	Caliber/Gauge & Type	Serial #
1	Remington	12-gauge shotgun	A826429M
2	Privately Made Firearm ("PMF")	7.62-mm rifle	None

3	Harrington & Richardson	.410-bore shotgun	HV29*4**
4	PMF	.300-cal. Rifle	None
5	PMF	5.56-mm rifle	None
6	Benelli	12-gauge shotgun	2000DU5442
7	Marlin	.22-cal. Rifle	20640917
8	Marlin	.30-30-cal. Rifle	24020430
9	Armsan Silah Sanayi	12-gauge shotgun	D6P00191
10	Remington	.30-06-cal. Rifle	RM09400F
11	HS Produkt	.40-cal. Pistol	MG274642
12	PMF	.410-bore shotgun	None
13	PMF	.223-cal. Rifle	None
14	CMMG Banshee	9-mm pistol	TTB06733

All in violation of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), and 2(a).

COUNT TWO

(Possession of a firearm by a convicted felon)

THE GRAND JURY FURTHER CHARGES THAT:

1. Between on or about April 11, 2024, and April 18, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR and ALLISON A. MUNDT,

each knowing that he or she previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms which, prior to their possession of each had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms involved in the offense included the following:

	Make	Caliber/Gauge & Type	Serial#.
1	Remington	12-gauge shotgun	A826429M
2	Harrington & Richardson	.410-bore shotgun	HV29*4**
3	Benelli	12-gauge shotgun	2000DU5442
4	Marlin	.22-cal. rifle	20640917
5	Marlin	.30-30-cal. rifle	24020430
6	Armsan Silah Sanayi	12-gauge shotgun	D6P00191
7	Remington	.30-06-cal. rifle	RM09400F
8	HS Produkt	.40-cal. pistol	MG274642
9	CMMG Banshee	9-mm pistol	TTB06733
10	Komando	12-gauge shotgun	2033111118
11	Remington	7-mm rifle	M72019526
12	German Sports Guns	.22-cal. pistol	A492876
13	Remington	.243-cal. rifle	71488313
14	Harrington & Richardson	12-gauge shotgun	None
15	Taurus	9-mm pistol	TJW73944
16	Beretta	.380-cal. pistol	PC046486
17	Taurus	.45-cal. revolver	AEC234787
18	Girsan	.45-cal. pistol	T6368-20AB05125
19	North American Arms	.22-cal. revolver	R59506

20	Tennessee Arms	Multi-caliber rifle	A000003590
21	Enfield	Unspecified caliber	HC28437A
22	Rossi	.357-cal. pistol	K286314
23	Marlin	.30-30-cal. rifle	25165301
24	Aero Precision	5.56-mm pistol	M4-0061950

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THREE

(Transfer and possession of a machinegun)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR

knowingly transferred and possessed a machinegun, namely, a 5.56-mm rifle with no serial number, which, at the time of his possession and transfer of it, he knew of its essential characteristics to qualify as a machinegun.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FOUR

(Conspiracy to distribute and possess with the intent to distribute methamphetamine)

THE GRAND JURY FURTHER CHARGES THAT:

From at least April 11, 2024, and continuing until on or about April 18, 2024, in the State and Eastern District of Wisconsin and elsewhere,

JOHN D. TAYLOR and ALLISON A. MUNDT

knowingly and intentionally conspired with each other, and with persons known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT FIVE

(Distribution of methamphetamine)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR and ALLISON A. MUNDT

knowingly and intentionally distributed a mixture and substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2(a).

COUNT SIX

(Possession of firearms in furtherance of drug trafficking)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR and ALLISON A. MUNDT

knowingly possessed at least one firearm in furtherance of a drug trafficking crime, namely, conspiracy to distribute and possess with intent to distribute a controlled substance, as charged in Count Four of this indictment, and distribution of a controlled substance, as charged in Count Five of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2(a).

COUNT SEVEN

(Transfer and possession of a machinegun)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR

knowingly transferred and possessed a machinegun, namely, a CMMG Banshee 9-mm pistol bearing serial number TTB06733, which, at the time of his possession and transfer of it, he knew of its essential characteristics to qualify as a machinegun.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT EIGHT

(Possession of methamphetamine with the intent to distribute)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 18, 2024, in the State and Eastern District of Wisconsin,

JOHN D. TAYLOR and ALLISON A. MUNDT

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

NOTICE OF FORFEITURE

- 1. Upon conviction of Counts Four, Five, or Eight of this indictment, the defendant(s) shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offenses.
- 2. Upon conviction of Counts One, Two, Three, Six, or Seven of this indictment, the defendants shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offenses, including, but not limited to, hundreds of rounds of assorted ammunition, and the following firearms seized at N**** CTH EE in Redgranite, Waushara County, Wisconsin, on April 18, 2024:

	<i></i> Make≘	Caliber/Gauge & Type	Serial#*
1	Remington	12-gauge shotgun	A826429M
2	Harrington & Richardson	.410-bore shotgun	HV29*4**
3	Armsan Silah Sanayi	12-gauge shotgun	D6P00191
4	Remington	.30-06-cal. rifle	RM09400F
5	HS Produkt	.40-cal. pistol	MG274642
6	CMMG Banshee	9-mm pistol	TTB06733
7	Komando	12-gauge shotgun	2033111118
8	Remington	7-mm rifle	M72019526
9	German Sports Guns	.22-cal. pistol	A492876
10	Remington	.243-cal. rifle	71488313
11	Harrington & Richardson	12-gauge shotgun	None
12	Taurus	9-mm pistol	TJW73944
13	Beretta	.380-cal. pistol	PC046486
14	Taurus	.45-cal. revolver	AEC234787
15	Girsan	.45-cal. pistol	T6368-20AB05125

16	North American Arms	.22-cal. revolver	R59506
17	Tennessee Arms	Multi-caliber rifle	A000003590
18	Enfield	Unspecified caliber	HC28437A
19	Rossi	.357-cal. pistol	K286314
20	Marlin	.30-30-cal. rifle	25165301
21	Aero Precision	5.56-mm pistol	M4-0061950
22	PMF	7.62-mm rifle	None
23	PMF	.300-cal. rifle	None
24	PMF	5.56-mm rifle	None
25	PMF	.410-bore shotgun	None
26	PMF	.223-cal. rifle	None

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

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FOREPERSON

Dated: 14 MAY 2024

GREGÖRY J. HAANSTAD United States Attorney